

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NEVILLE MCFARLANE, EDWARD HELLYER, DEANNA COTTRELL, CARRIE MASON-DRAFFEN, HASEEB RAJA, RONNIE GILL, JOHN FRONTERA, SHARIQ MEHFOOZ, and STEVEN PANICCIA, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

ALTICE USA, INC., a New York Corporation,

Defendant.

Lead Case No. 20-CV-1297 (consolidated with 20-CV-1410)

PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support Plaintiffs' Motion for Preliminary Approval of Settlement, the Declaration of William B. Federman in Support of Plaintiffs' Motion for Preliminary Approval and its exhibits thereto, and all prior pleadings and proceedings had herein, Plaintiffs Neville McFarlane ("McFarlane"), Deanna Cottrell ("Cottrell"), Edward Hellyer ("Hellyer"), Carrie Mason-Draffen ("Mason-Draffen"), Haseeb Raja ("Raja"), Ronnie Gill ("Gill"), John Frontera ("Frontera"), Shariq Mehfooz ("Mehfooz"), and Steven Paniccia ("Paniccia"), individually and on behalf of the putative class, (collectively, "Plaintiffs") move pursuant to Federal Rule of Civil Procedure 23 for and Order: (1) granting preliminary approval of the proposed Settlement; (2) preliminarily certifying a class for purposes of Settlement; (3) appointing Plaintiffs as Class Representatives;

(4) appointing William B. Federman and A. Brooke Murphy of Federman & Sherwood as Class Counsel; (5) approving the Parties' proposed form and method of giving notice of the pendency of this action and the Settlement to the Settlement Class; (6) directing that notice be given to the Settlement Class; (7) scheduling a hearing at which time the Court will consider the request for final approval of the Settlement and request for attorneys' fees, expenses, and service awards to Plaintiffs; and (8) granting such other relief and further relief as the Court deems just and proper.

Dated: April 27, 2022

Respectfully submitted,

/s/ William B. Federman

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Additional Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2022, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ William B. Federman

William B. Federman